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ENTERED



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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 2, 2004

R. Paul Detwiler, Acting Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

RE: NMED APPROVAL OF THE ADVANCED MIXED WASTE TREATMENT PLANT FINAL
AUDIT REPORT, AUDIT A-04-12
WASTE ISOLATION PILOT PLANT
EPA I.D. NUMBER NM4890139088

Dear Mr. Detwiler and Dr. Warren:

On May 7, 2004, the New Mexico Environment Department (NMED) received the Final Audit Report of the Advanced Mixed Waste Treatment Plant (AMWTP) Audit Number A-04-12 (Audit Report), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (the Permittees) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this certification audit was to ensure the adequacy, implementation, and effectiveness of the AMWTP waste characterization processes for contact-handled S3000 (solids) waste characterization activities as they relate to the addition of the Consonant Technologies, Inc. (CTI) headspace gas sampling and analysis system, relative to the requirements of the WIPP Permit. The final Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final AMWTP standard operating procedures (hardcopy and electronic)
- Objective evidence examined during the audit
 - General information
 - Headspace gas

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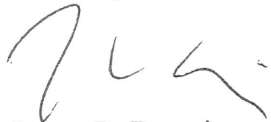


NMED representatives observed the AMWTP audit on April 12 – 15, 2004. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Conditions II.C.2 (Audit and Surveillance Program) and II.C.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there were no WAP-related conditions adverse to quality, no deficiencies requiring only remedial actions, no observations, and no recommendations identifying opportunities for improvement. Attached are NMED's general comments based upon observation of the AMWTP audit and review of the Audit Report. These are provided to guide future audit report preparation and to assist the Permittees in understanding NMED's concerns. NMED requests that the Permittees correct the items listed in the attachment and return them, indicating revisions to any text in the Audit Report and checklists with redline/strikeout annotation. This will ensure the administrative record contains a complete and accurate Audit Report.

NMED concludes that this Audit Report demonstrates that AMWTP has adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for AMWTP Audit A-04-12 for contact-handled S3000 (solids) waste characterization activities as they relate to the addition of the CTI headspace gas sampling and analysis system, and amends the previous Audit Report approval for Audit A-03-05 issued by NMED on December 23, 2003 to include all waste forms and processes evaluated by this recertification audit.

If you have any questions regarding this matter, please contact me at (505) 428-2512.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:soz

Attachment

cc: Charles Lundstrom, NMED WWMD
Steve Zappe, NMED HWB
Tracy Hughes, NMED OGC
Laurie King, EPA Region 6
Betsy Forinash, EPA ORIA
Connie Walker, Trinity Engineering
Don Hancock, SRIC
Joni Arends, CCNS
File: Red WIPP '04

NMED COMMENTS ON THE
ADVANCED MIXED WASTE TREATMENT PLANT (AMWTP)
FINAL AUDIT REPORT A-04-12

NMED's review indicated that the Audit Report showed less attention to detail than presented in previous Audit Reports and, unless remedied, this less rigorous approach to preparation could result in significant deficiencies in future Audit Reports. The body of the Audit Report appears to generally address the applicable elements. However, the following items on the B6 checklist need to be addressed by the Permittees:

1. Question number 17 cites procedure INST-OI-43 Section 4.1.3.9. Should the cited section be 4.1.3.10?
2. Question 36 A&B cites procedure INST-OI-43 Section 4.11.9. The cited does not answer the question.
3. Question 187 cites INST-OI-43 Section 4.10.6. The cited does not answer the question.
4. Questions 220 and 221 cite procedure INST-OI-43 Section 4.1.3.9 for PDP. PDP is cited in Section 4.1.3.10. Is the cited Section correct?